

LEAGUE
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December 22, 1997

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Ex Parte Presentation
WT Docket No. 97-153
Amendments to Part 90 of the Commission's Rules Concerning Private Land
Radio Services

Dear Mr. Caton:

We write in support of the Ex Parte presentation document submitted to you by Self Help for Hard of Hearing People, Inc. (SHHH) on November 17, 1997.

The League for the Hard of Hearing is the oldest hearing rehabilitation agency in the country. We offer a comprehensive program of services to enable infants, children and adults to better function. Annually, the League provides services to 18,000 individuals and their families from all economic, social and ethnic groups regardless of degree of hearing loss or choice of communication style.

There are some 28 million people with hearing loss in this country, only two million of whom are profoundly deaf and use sign language as their primary means of communication. For the 26 million people who use their residual hearing, when the hearing aid is simply not enough, assistive listening devices are often the key to providing communication access in school, work, at lectures and public events, at movies and theater performances, even when socializing with family and friends. In addition, assistive listening devices qualify as an auxiliary aid mandated by the Americans with Disabilities Act of 1990 as a means of providing communication access in the workplace, schools, courts, state and local government facilities and in public accommodations such as hotels, hospitals, theaters and cinemas. In short, assistive listening devices are not only the technology that allows millions of Americans to fully enjoy their lives, but they are the means for places of public accommodation to comply with the law.

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A vast number of assistive listening devices that are used by people who are hard of hearing depend on radio frequency. In the past, interference from conflicting radio signals has posed a serious problem for people who use assistive devices. It is likely that if this problem is not addressed it will become more of a problem in the future, as expectations are that the number of FM devices used for people who are hard of hearing will increase as the baby boomers, who are much more comfortable with technology than their elders, age into hearing loss. In addition, those FM devices that are used are more and more likely to be subjected to interference from such high power electronic devices such as pagers, emergency dispatch vehicles and cellular phones.

We agree with SHHH's compelling statement that "...creating interference-free channels offer[s] a very promising alternative to the existing 72-76 MHz band which...continues to be, plagued by increasing, serious interference from high powered users." We agree with the Commission when they state in Docket No. 97-153 that "an increased use of the 216-217 MHz band for telemetry communications nears schools or hospitals could result in harmful interference to auditory assistance devices and radio-based health care devices."

We agree with and urge the Commission to favorably consider SHHH's suggested solutions to the problems of shared use of the 216-217 MHz band, by allowing assistive listening devices exclusive use of that band width.

We thank the Commission for their work on this important matter and for the opportunity to address this issue.

Sincerely,



Keith D. Muller, ACSW
Executive Director

cc: Donna Sorkin
Meryl Icové, Esq.
Ms. Pamela Gregory
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